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Subject: rapa: Submission to US HPV Challenge Program, Consortium No. 11100

US High Production Volume (HPV) Challenge Program

Attached please find copies of a cover letter, "Testing Rationale" and IUCLID-formatted robust summary documents for Zinc dibutyldithiocarbamate (CAS no. 136-23-2), one of 39 chemicals being sponsored in the HPV Program by the Rubber & Plastic Additives Panel of the American Chemistry Council. Hard copies of these documents, including the official signed cover letter, are also being sent to EPA's designated HPV Program address in Merrifield, Virginia.

Please let me know if there are any difficulties with this transmission.

(See attached file: rapa\_zdbc\_cvrltr\_011503.pdf) (See attached file: zdbctestplan\_dec02.pdf) (See attached file: ZDBCRobustSum\_011303.pdf)

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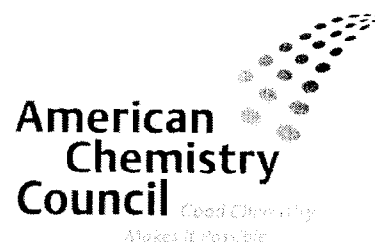
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COURTNEY M. PRICE  
VICE PRESIDENT  
CHEMSTAR



January 15, 2003

**Via US Mail and e-mail**

Christine Todd Whitman, Administrator  
U.S. Environmental Protection Agency (EPA)  
P.O. Box 1473  
Merrifield, VA 22116

**Re: Rubber and Plastic Additives (RAPA) Panel, Consortium No.  
HPV Chemical Challenge Program Submission  
Zinc Dibutyldithiocarbamate (ZDBC)  
Testing Rationale and Robust Summaries**

Dear Governor Whitman:

The RAPA Panel of the American Chemistry Council is pleased to submit the attached documents to EPA's High Production Volume (HPV) Chemical Challenge Program (Program) as the test plan for one of the 39 chemicals RAPA is voluntarily sponsoring in the Program. The RAPA Panel includes the following member companies: Alco Chemicals, Bayer Corporation; Ciba Specialty Chemicals Corporation; Crompton Corporation; Eliokem, Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; The Lubrizol Corporation; Noveon, Inc.; and, R.T. Vanderbilt Company, Inc.

In this submission, please find the *Testing Rationale: Zinc dibutyldithiocarbamate* (CAS no. 136-23-2), as indicated in the following table.

RAPA Panel	
Chemicals Sponsored in the US HPV Chemical Challenge Program	
CAS Number	Compound Name
136-23-2	Zinc dibutyldithiocarbamate (ZDBC)

In addition to the *Testing Rationale*, please also find attached robust summaries for ZDBC contained in an IUCLID-formatted document.

This submission also is being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov  
Chem.rtl@epa.gov



Responsible Care®

Christine Todd Whitman  
RAPA-HPV  
January 15, 2003  
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If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or [anne\\_lehuray@americanchemistry.com](mailto:anne_lehuray@americanchemistry.com).

Sincerely yours,

Courtney M. Price  
Vice President, CHEMSTAR

Attachments